1	RAMIRO MORALES [Bar No.: 7101] E-mail: rmorales@mfrlegal.com MARC J. DEREWETZKY[Bar No.: 6619]			
2				
3	E-mail: mderewetzky@mfrlegal.com MORALES, FIERRO & REEVES			
4	600 South Tonopah Drive, Suite 300 Las Vegas, Nevada 89106			
5	Telephone: (702) 699-7822 Facsimile: (702) 699-9455			
6	Attorneys for Plaintiff ZURICH AMERICAN INSURANCE COMPANY			
7	INSURAINCE COMPANY			
8	UNITED STATES DISTRICT COURT			
9	DISTRICT OF NEVADA			
10	ZURICH AMERICAN INSURANCE COMPANY,) CASE NO.: 2:20-cv-01374-APG-DJA		
11	Plaintiff,))) STIPULATION TO EXTEND TIME TO		
12	VS.) RESPOND TO MOTION TO STRIKE AND TO REPLY		
13	ASPEN SPECIALTY INSURANCE)		
14	COMPANY,			
15	Defendant.			
16		,		
17	COME NOW Plaintiff Zurich American Insurance Company ("Zurich") and Defendant			
18	Aspen Specialty Insurance Company ("Aspen") and hereby submit the following Stipulation and			
19	Order to Extend Time to Respond To Motion To Strike and to Reply thereto.			
20	WHEREAS Zurich agreed to extend Aspen's time to respond to Zurich's complaint in this			
21	matter to October 27, 2020; and			
22	WHEREAS on October 26, 2020, Aspen filed and served its Motion to Dismiss Zurich's			
23	complaint (Dkt# 7); and			
24	WHEREAS Zurich's response to Aspen's Motion to Dismiss is due on before November			
25	10, 2020; and			
26	WHEREAS Aspen's counsel has agreed as a professional courtesy to stipulate to extend			
27	Zurich's time to respond by 21 days to allow sufficient time for Zurich to respond to the issues			
28	raised by Aspen's Motion to Dismiss; and			

CASE NO.: 2:20-cv-01374-APG-DJA

Case 2:20-cv-01374-APG-DJA Document 10 Filed 11/05/20 Page 2 of 4

1	WHEREAS Zurich's counsel has agreed as a professional courtesy to stipulate to extend		
2	Aspen's time to file a reply to Zurich's response by 21 days;		
3	IT IS HEREBY STIPULATED AND AGREED that Zurich's time to respond to Aspen's		
4	Motion to Dismiss is extended to December 1, 2020, and Aspen's time to file a Reply is extended		
5	to December 29, 2020.		
6	Respectfully submitted this 5 th day of November 2020.		
7			
8	MESSNER REEVES, LLP	MORALES FIERRO & REEVES	
9			
10	By <u>/s/ Ryan L. Loosvelt</u> MICHAEL M. EDWARDS	By <u>/s/ Ramiro Morales</u> RAMIRO MORALES	
11	Nevada Bar No. 6281 RYAN A. LOOSVELT	Nevada Bar No. 7101 MARC J. DEREWETZKY	
12	Nevada Bar No. 8550 8945 W. Russell Road, Suite 300	Nevada Bar No. 6619 600 S. Tonopah Dr., Suite 300	
13	Las Vegas, NV 89148 Attorneys for Defendant	Las Vegas, NV 89106 Attorneys for Plaintiff Zurich	
14	Aspen Specialty Insurance Company	American Insurance Company	
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

CASE NO.: 2:20-cv-01374-APG-DJA

1 CERTIFICATE OF SERVICE 2 I, the undersigned, am over the age of eighteen and am an employee at Morales, Fierro & Reeves, and hereby certify that the following document(s) were served a follows: 3 4 STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO MOTION TO STRIKE AND TO REPLY 5 6 XXSubmitted electronically for filing and service with the U.S.D.C., District of Nevada CM/ECF system on the below date. 7 Service was effectuated on the following party/person(s): 8 MICHAEL M. EDWARDS 9 Nevada Bar No. 6281 RYAN A. LOOSVELT 10 Nevada Bar No. 8550 8945 W. Russell Road, Suite 300 11 Las Vegas, NV 89148 Attorneys for Defendant 12 Aspen Specialty Insurance Company 13 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Dated this 5^{th} day of November 2020. 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

CASE NO.: 2:20-cv-01374-APG-DJA

1 2 3 4 5 6 7	RAMIRO MORALES [Bar No.: 7101] E-mail: rmorales@mfrlegal.com MARC J. DEREWETZKY[Bar No.: 6619] E-mail: mderewetzky@mfrlegal.com MORALES, FIERRO & REEVES 600 South Tonopah Drive, Suite 300 Las Vegas, Nevada 89106 Telephone: (702) 699-7822 Facsimile: (702) 699-9455 Attorneys for Plaintiff ZURICH AMERICAN INSURANCE COMPANY		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	ZURICH AMERICAN INSURANCE COMPANY,) CASE NO.: 2:20-cv-01374-APG-DJA	
11	Plaintiff,	,)) [PROPOSED] ORDER ON STIPULATION	
12	VS.	TO EXTEND TIME TO RESPOND TO MOTION TO STRIKE AND TO REPLY	
13	ASPEN SPECIALTY INSURANCE		
14	COMPANY,		
15	Defendant.))	
16 17	ORDER		
18	The parties hereto, by and through their respective counsel of record, having submitted a		
19	stipulation to extend the time for Plaintiff Zurich American Insurance Company ("Zurich") to		
20	respond to Defendant Aspen Specialty Insurance Company's ("Aspen") motion to dismiss the		
21	complaint in this action, and the time for Aspen to submit a reply in support of its motion, IT IS		
22	HEREBY ORDERED that the time for Zurich to respond to Aspen's motion is extended to		
23	December 1, 2020, and the time for Aspen to reply in support of its motion is extended to		
24	December 29, 2020.		
25	IT IS SO ORDERED.		
26	DATED: November 5, 2020		
27	2.1.2.2. November 3, 2020	al	
28		UNITED STATES DISTRICT JUDGE	

1